

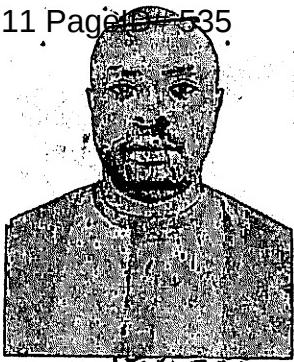
# EXHIBIT

J1 ✓

Ex J2



**HIGH COURT OF JUSTICE  
FEDERAL CAPITAL TERRITORY, ABUJA**



**GENERAL FORM OF AFFIDAVIT**



I **JOSHUA IZANG MADAKI**

2

**NO.8 TAURA CLOSE, PHASE 2 SITE 2 KUBWA ABUJA.**

Make oaths and says

1. That **I AM THE ABOVE NAMED PERSON AND A LEGAL PRACTITIONER AND WAS AN EMPLOYEE IN THE LAWFIRM OF OGEBE OGEBE LEGAL PRACTITIONERS TILL OCTOBER 2016.**
2. That **ON THE 17TH MARCH, 2016, I PERSONALLY SERVED ON THE MINISTRY OF FOREIGN AFFAIRS TWO COPIES OF THE SAME LETTER DATED 16TH MARCH, 2016 AND ADRESSED TO THE MINISTER OF FOREIGN AFFAIRS.**
3. That **THE SAID LETTERS WERE SERVED ON THE MINISTER AND PERMANENT SECRETARY AT THE MINISTRY OF FOREIGN AFFAIRS HEADQUARTERS, CENTRAL BUSINESS DISTRICT ABUJA, NIGERIA.**
4. That **RECEIVED/ACKNOWLEDGED COPIES OF THE LETTERS SERVED ON THE MINISTER & PERMANENT SECRETARY ARE HEREBY ATTACHED AND MARKED AS EXHIBITS OOLP 1 AND OOLP 2 RESPECTIVELY.**
5. That **PRIOR TO SERVING THE LETTERS, I MET WITH THE DIRECTOR OF LEGAL TO THE FOREIGN AFFAIRS MINISTRY ON OUR CLIENTS (MR. EMMANUEL OGEBE) INSTRUCTION ON THE 4TH DEC. 2015 AND CALLED HER ATTENTION**

6. That I make this solemn declaration conscientiously believing that same to be true by virtue of the provision of the Oath Act. 1990.

Date: **18/10/2019**

.....  
**DEPONENT**

I certify that the above declaration has been read and interpreted to the declarant and that he/she appears clearly to understand the same and affixed his/her mark to it in my presence.

Date: **18/10/2019**

.....  
**INTERPRETER**

Declared at **HIGH COURT MAITAMA** in **ABUJA** State

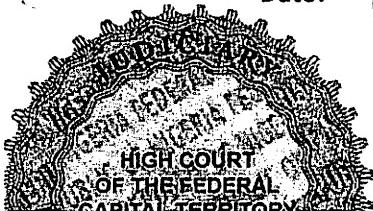
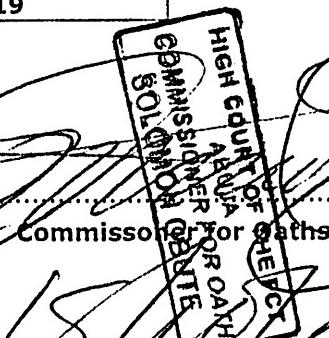
This **18TH** day of **OCTOBER** **2019**

Fees Paid: **N500.00**

Receipt No: **Z11655806**

Date: **18/10/2019**

**BEFORE ME**





HIGH COURT OF JUSTICE  
FEDERAL CAPITAL TERRITORY, ABUJA

GENERAL FORM OF AFFIDAVIT

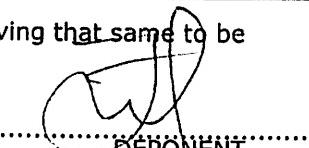
I **CONTINUE.....**

3

of \_\_\_\_\_ Make oaths and says

1. That **TO THE CONTENTS OF EXHIBITS OOLP 1&2 AND OUR EARLIER LETTERS TO THE MINISTRY.**
2. That **I DEPOSE TO THIS AFFIDAVIT IN GOOD FAITH AND FOR RECORD PURPOSE.**
3. That **NIL.**
4. That **NIL.**
5. That **NIL.**
6. That I make this solemn declaration conscientiously believing that same to be true by virtue of the provision of the Oath Act. 1990.

Date: **18/10/2019**

.....  
  
DEPONENT

I certify that the above declaration has been read and interpreted to the declarant and that he/she appears clearly to understand the same and affixed his/her mark to it in my presence.

Date: **18/10/2019**

.....  
INTERPRETER

Declared at **HIGH COURT MAITAMA** in **ABUJA** State

This **18TH** day of **OCTOBER** **2019**

Fees Paid: **N500.00**

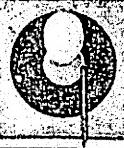
Receipt No: **Z11655806**

BEFORE ME

Date: **18/10/2019**

Commissioner for Oaths  
HIGH COURT  
OF THE FEDERAL  
CAPITAL TERRITORY  
ABUJA  
NIGERIA





# Ogebe Ogebe

Legal Practitioners

[www.ogebeogebehlp.com](http://www.ogebeogebehlp.com)

## EXHIBIT OOL P 2

16 March 2016

The Honourable Minister of Foreign Affairs

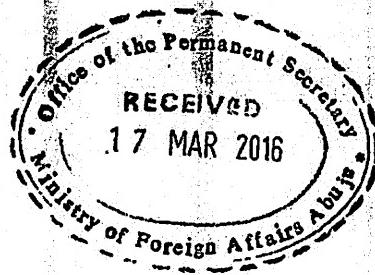
Of the Federal Republic of Nigeria

Ministry of Foreign Affairs

Central Business District

Abuja

Dear Hon Minister,



**REMINDER RE:**

**HARRASSMENT, BLACKMAIL, PEDDLING  
OF FALSE INFORMATION, INTIMIDATION,  
ABUSE OF OFFICE AND INFRINGEMENT OF  
FUNDAMENTAL RIGHTS OF EDUCATION  
MUST CONTINUE INITIAIVE, EMMANUEL OGEBE  
AND PAUL AND BECKY GADZAMA BY THE NIGERIAN  
EMBASSY IN THE UNITED STATES OF AMERICA**

As you may recall, we had written a letter to you dated 01 December 2015 on the above subject and delivered same to your offices on or about 02 December 2015 and regrettably we have not received a response or acknowledgment of same from your office till date. (copy attached) In this same period while we awaited a response, and corrective action, the Nigerian Embassy in Washington DC proceeded full steam in their illegality, abuse of office and conduct incongruent with their diplomatic status. They have brazenly continued with the harassment and intimidation of the Chibok school girls and their families in Nigeria to the extent of threatening not to assist them if they do not denounce the EMCI and Mr. Emmanuel Ogebe as their sponsors and guardian respectively. The girls had previously refused to sign a letter the embassy drafted for them thus their resorting to inducement, threats and intimidation.



# Ogebe Ogebe

Legal Practitioners

www.ogebeogebe.com

## EXHIBIT OOLP 1

16 March 2016

The Honourable Minister of Foreign Affairs  
Of the Federal Republic of Nigeria  
Ministry of Foreign Affairs  
Central Business District  
Abuja



Dear Hon Minister,

✓ HIBET - 10208  
Ref 211653268  
Date 18/03/14

**REMINDER RE:**  
**HARRASSMENT, BLACKMAIL, PEDDLING**  
**OF FALSE INFORMATION, INTIMIDATION,**  
**ABUSE OF OFFICE AND INFRINGEMENT OF**  
**FUNDAMENTAL RIGHTS OF EDUCATION**  
**MUST CONTINUE INITIAIVE, EMMANUEL OGEBE**  
**AND PAUL AND BECKY GADZAMA BY THE NIGERIAN**  
**EMBASSY IN THE UNITED STATES OF AMERICA**

As you may recall, we had written a letter to you dated 01 December 2015 on the above subject and delivered same to your offices on or about 02 December 2015 and regrettably we have not received a response or acknowledgment of same from your office till date. (copy attached) In this same period while we awaited a response, and corrective action, the Nigerian Embassy in Washington DC proceeded full steam in their illegality, abuse of office and conduct incongruent with their diplomatic status. They have brazenly continued with the harassment and intimidation of the Chibok school girls and their families in Nigeria to the extent of threatening not to assist them if they do not denounce the EMCI and Mr. Emmanuel Ogebe as their sponsors and guardian respectively. The girls had previously refused to sign a letter the embassy drafted for them thus their resorting to inducement, threats and intimidation.

lawyers outreach to Nigerian Govt

01 December 2015

The Honourable Minister of Foreign Affairs  
Of the Federal Republic of Nigeria  
Ministry of Foreign Affairs  
Maitama  
Abuja

Dear Sir

**HARRASSMENT, BLACKMAIL, PEDDLING  
OF FALSE INFORMATION, INTIMIDATION,  
ABUSE OF OFFICE AND INFRINGEMENT OF  
FUNDAMENTAL RIGHTS OF EDUCATION  
MUST CONTINUE INITIAIVE, EMMANUEL OGEBE  
AND PAUL AND BECKY GADZAMA BY THE NIGERIAN  
EMBASSY IN THE UNITED STATES OF AMERICA**

We write as Counsel to and under the instruction of Education Must Continue Initiative ("EMCI"), Mr. Emmanuel Ogebe ("Mr. Ogebe") and Mr. and Mrs Paul Gadzama (the "Gadzamas") – collectively our "Clients" - to bring to your attention the rather untoward, unsavoury and downright illegal actions of the Nigerian Embassy in Washington DC which is interfering with and infringing the constitutional and personal rights of our Clients collectively.

#### **Background Facts**

- (i) In June 2014, Mr. Ogebe and the Gadzamas conceived the "study abroad project" specifically designed for the abducted/escaped Chibok schoolgirls after noting at the time that nothing was being done for them individually and as a group. To actualize this project, the EMCI was jointly formed as a non governmental organization under Nigerian law to serve as the vehicle thereof;

- (ii) Over several months, the Gadzamas proceeded to identify 10 of the escaped Chibok girls and spoke with their families to seek their consent to participate;
- (iii) The various families consented and indeed handed over the girls to the EMCI and swore affidavits to that effect;
- (iv) Mr. Ogebe upon his return to his domicile in the United States of America ("USA") used his contacts to raise funds for the travel, upkeep and general living expenses of the identified girls. He also obtained full yearly scholarships for tuition and board for 10 girls from the MMS (acronym for the school to protect the girls) at the rate of \$15,000.00 each;
- (v) In compliance with USA regulations on the activities of Non Governmental Organizations, Mr. Ogebe channeled the funds to Jubilee Campaign ("JC") a US NGO he partners with to administer the funds for the project and to further raise funds for the needs of all the school girls that would be brought under the project online. He therefore transferred all the funds he raised to JC;
- (vi) The Gadzamas on their part coordinated and sponsored the transportation, upkeep and administrative costs of getting the schoolgirls from Chibok to Jos, Abuja and Lagos respectively for their visa, passport processing and overseas flights. The Gadzamas stood as guarantors to all the girls at the American Embassy while Mr. Ogebe stood as their point of contact in the USA and legal guardian. JC was not at all a party to any of these pre-travel arrangements and expenses ;
- (vii) Subsequently JC announced to EMCI that they had obtained full scholarships for ten school girls from Canyonville Christian Academy Oregon ("CCA") valued at \$26,300.00 each per annum plus flight costs from Nigeria. Inspite of concerns about the distance to Oregon and the attendant expense, the EMCI accepted the scholarship offer as it included transportation costs;
- (viii) Thus in the second half of 2014, six Chibok girls were safely relocated to and settled with MMS while four girls went to CCA in Oregon.

**Termination of Relationship**

**With JC and CCA**

- (ix) Within a month of the arrival of the four school girls in Oregon, the CCA though Mr. Doug Wead made a request for the reimbursement of over \$150,000.00 from Mr. Ogebe and JC for expenses that could not be substantiated including school fees. This constituted a breach of CCA's legal promise in the 1-20 Form submitted to the American Embassy in Nigeria to provide the full scholarships to the girls.
- (x) The CCA failed to meet its own commitments to the girls, for example they failed to provide adequate educational services and classes, repeatedly violated the girls' personal security requirements, purchased the widespread distribution of a press release announcing the girls' specific location to the public which asked for donations, encouraged the public to contact the girls and continued to make unreasonable demands to JC;
- (xi) This culminated in the JC making suspicious payments in the sum of \$25,000.00 and \$15,000.00 to CCA and MMS respectively to cover the "tuition and living expenses" of the school girls who were supposed to be on fully paid scholarship with the schools without discussing with our clients thus bankrupting the legitimate care fund for the girls; after JC refused to pay for the girls' flights for easter break, our Clients had to terminate the arrangement with JC by letter dated March 24, 2015. (xii) Following the refusal of CCA to release the girls on summer break for 48 hours despite repeated pleas by our clients inter alia, the girls transferred to another school for the next academic year. Since then the CCA which was obviously using the girls as a front to raise \$300,000 online has engaged the services of the Nigerian Embassy in Washington DC to harass, intimidate and discredit our Clients while hoping to seize all the girls and hand them over to the CCA to justify their continuing fundraising six months after the girls left their school.

**Unlawful and Witchunting  
Activities of the Nigerian Embassy**

The Nigerian Embassy in the United States through one of its members of staff named Ezinne Osuigwe started disrupting the 'Chibok girls' classes by intermittently and surreptitiously calling and visiting the girls at school during classes, with the aim of luring them to make statements and comments against our clients by offering them inducements such as their property which has been illegally detained by CCA and money. Ezinne went further to threaten the educationists helping them receive excellent education and ordering them not to deal with our Clients and alleging that the guardianship documents given to them by their families are fake, as our Clients would soon discover.

The Embassy has raised spurious charges alleging that our Clients have been using the girls to raise funds. This allegation is not only maliciously but clearly disingenuous. While our Clients have not conducted any fund raiser for the girls especially as Ezinne sabotaged the earlier offer of the Nigerian ambassador to host one, it is pertinent to state that NGOs must naturally raise money for the sustenance of projects. There is nothing untoward there nor is there any such criminal offence in existence. After all obtaining scholarships for the girls also amounts to fund raising and we are yet to see how that is criminal in nature.

We have it on good authority that the Embassy has recommended to your office that our Clients be arrested and prosecuted for alleged "fundraising with the girls". We ordinarily would not have taken this seriously seeing as no such offence exists anywhere in the world while we also know that the Federal Government of Nigeria has more serious things to do like locating the other over 200 Chibok girls still missing and would not be working towards truncating the great progress and privilege being enjoyed by these few escaped ones without the help of the Federal Government at all. However last week the Nigerian Embassy drafted a "distress" note to the girls at MMS requesting them to sign and return to the embassy, which reads as follows:

"Dear Nigerian Embassy

We ask you to help us. While we are thankful for the help Emmanuel Ogebe has given us, from this time forward we do not want to go to his house again or be released into his care. Until we hear from the Nigerian government, we will stay here at Mountain Mission School, where we are happy and loved and are receiving the education we came to America to get.

With Love

Chibok Girls at Mountain Mission School."

While this interloping and irresponsible backdoor moves by the Embassy are greatly disturbing and unbecoming of her diplomatic status, we find it further alarming that the Embassy has simply refused to afford our Client an opportunity to be heard and has rebuffed three different requests by our Clients to meet. Indeed our Clients have not been briefed on the allegations against them or been given an opportunity to provide their answers to the allegations. Ezinne pretended to be on regular consular visit to the girls, which our clients willingly facilitated, and then used the opportunity to try and poison the minds of the girls against our clients.

The true intents of Ezinne and the Embassy has however come to the open as we recently stumbled upon an online fundraising campaign tagged "Chibok Girls Assistance Fund" on the website "gofundme.com" where a person named Somiari Demm working in concert with Ezinne of the Nigerian Embassy has claimed guardianship of the school girls and is presently soliciting for funds for their upkeep. A screenshot of the page obtained today 02 December 2015 is attached herewith for your information. Please Note that the lady in the picture on the webpage posing with the Chibok girls subject of this letter is the said Ezinne of the Nigerian Embassy, USA. We find it appalling and repulsive that the Nigerian Embassy through its staff in conjunction with unknown elements has left its core diplomatic duties and is now using innocent girls to peddle falsehood all in a bid to defraud unsuspecting members of the public of

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their money. It is also evident that the whole aim of this kangaroo investigation is to seize the school girls and transfer them to Ezinne and perhaps the Nigerian Embassy for fund raising purposes and image laundering.

Seeing as the Embassy has decided to forge ahead with illegality and insists on trampling the rights of our Clients without affording them a fair-hearing, we hereby call on you to immediately bring to an end this charade and witch hunt by the Nigerian Embassy failing which we have our Clients' firm instructions to take all necessary legal measures to enforce their rights and bring the offending persons and bodies to justice. You are asked to desist from engaging US or any other authorities, public or private to harass our clients.

Please take note that if any further unauthorized contact is made by the Embassy or its agents to their wards or if our Clients are contacted howsoever concerning this matter we shall immediately proceed to commence legal action against the Federal Government and all its agencies involved in this debacle. We really hope that we are not pushed to the wall to take this line of action as the global embarrassment to the federal Government who has not been able to locate the missing girls but is intent on derailing the few ones making progress would be monumental. We are optimistic that you would use your good offices to redress this wrong and stop the persecution of the upright by preserving the integrity of good minded Organizations and Nigerians who are assiduously working to help victims of the insurgency and are themselves victims of the terrorism.

Yours faithfully  
**Ogebe Ogebe Legal Practitioners**

Joshua Madaki

CC: 1. Secretary to the Government of the Federation  
Office of the Secretary to the  
Government of the Federation  
ShehuShagari Complex  
Three Arms Zone Abuja